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May 19, 2015

Mr. David A. Evans,
Selvin, Wraith, Halman, LLP,
505 14th Street,
Suite 1200,
Oakland, California 94612
Via Fax Only (510) 465-8976

Re: Western World Insurance vs.
Professional Collection Consultants,
U.S.D.C. Case No. 2:15-cv-02342

Dear Mr. Evans:

I have just talked with Wendell about this case.

She advises me that she has told Plaintiff that Western World is denying coverage and sent them a copy of the lawsuit. Plaintiff initially suggested they settle the case for an assignment of a bad faith action against Western World, but when Wendell responded favorably to this, they abandoned this idea.

However, they are refusing to believe that there is no insurance on this case. I told Wendell that I have asked you for permission to replace them as counsel, and I shared with her that the reason was that my taking over the case would make counsel for Plaintiff **believe** that there was probably no coverage, which they do not believe now. Wendell thought that was a good idea. I did NOT share with Wendell any of the other reasons I want to take over this case.

She did tell me that they have not proceeded with any discovery, which is surprising. Apparently, they may be reassessing.

I think it is essential that Western World **immediately** agree to allow me to take over this case now. This will send a crystal clear message to the Plaintiff's that there will be no money for them to collect in the unlikely event they prevail.

Very truly yours,

LAW OFFICES OF CLARK GAREN

BY

CLARK GAREN